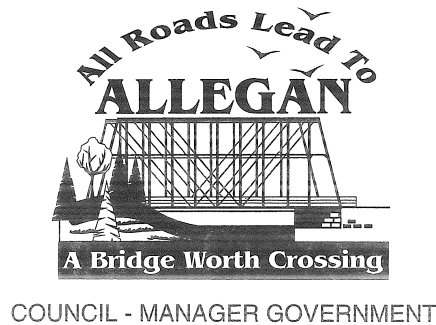


Office of  
*The Mayor*



112 Locust Street  
**Allegan, Michigan**  
**49010-1390**  
Phone (269) 673-5511  
Fax (269) 673-2869

December 14, 2015

Mr. Matthew Didier  
77 West Jackson Boulevard  
Chicago, IL 60604-3507

Re: FY2016 Brownfields Grant Proposal  
U.S. EPA Brownfields Hazardous Substances Grant  
City of Allegan  
Allegan, Michigan

Dear Mr. Didier:

The City of Allegan (City) is submitting the enclosed application for a U.S. EPA Brownfields Hazardous Substances Grant in the amount of \$200,000.

The City is located in the southwestern portion of Lower Michigan, approximately 20 miles east of Lake Michigan. Allegan is a micro-community of approximately 5,000 that encompasses a 4.3 square-mile area bordered by rural townships. The Kalamazoo River (a Great Lakes Area Concern and a Superfund site) literally wraps around the City, creating an abundance of waterways and water features visible throughout the City. The river drew settlers and industry to the area in the early 1900s, and the City was soon developed with mills and industrial operations. The City's neighborhoods developed around Perrigo Company (pharmaceuticals), Rockwell International automotive parts manufacturing, Haworth office furniture/accessories manufacturing, lumber mills, and wood processing operations that centered on the Kalamazoo River. The City prospered until the 1980s, when all manufacturing sectors began declining. Further downsizing in the manufacturing sector and the near failure of American automakers in 2008 and 2009 decimated the remaining industrial employers in the City, leaving the City with acres of brownfields, a vacant mill district along the river, and a downtown district struggling to reinvent itself. We have worked to acquire and coordinate public funding from state and federal agencies (a Region V Regional Priority) to begin the process of reviving our historic downtown district and deal with the industrial legacy that has left the Kalamazoo River designated as a Superfund site. We have even secured certification as a Redevelopment Ready Community by the State of Michigan and are poised to begin revitalizing our City. The main obstacle we are facing is addressing the brownfields that are impeding our redevelopment plans. The first step is evaluating the brownfields in the mill district (former industrial area adjacent to downtown that is surrounded on three sides by the Kalamazoo River) and the historic downtown district. Because of our small size and the importance of the river to the City's image and ability to bring in visitors, these brownfields are impacting our entire community.

The City has developed a well-functioning redevelopment program and it plans to use the Assessment Grant to advance and improve the brownfields arm of this program. The City

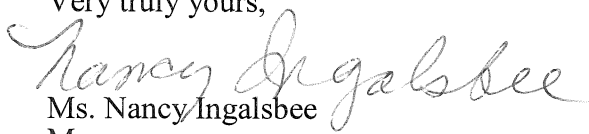
historically had a 2000 Brownfields Pilot Assessment Grant and was a member of a 2008 Assessment Coalition, both of which have been expended. We used these grants for the initial assessment of several commercial and industrial sites and riverfront areas in the City; however, we were unable to focus these funds on our two most influential districts: the mill and downtown districts. Now that the City has a functioning brownfield program, has developed plans/strategies for redevelopment of these two districts, and has coordinated additional state and federal funding, we are ready to take a more systematic approach to assessing brownfields in these areas to support revitalization of these key districts.

With grant funds, we can support the assessment and redevelopment of brownfields in these two districts, allowing our City to capitalize on its historical downtown area and spectacular natural setting to reinvent itself as a new urban community with opportunities for all of its citizens.

The following applicant information is provided as part of the Grant Application:

- a. Applicant Identification: City of Allegan  
112 Locust Street  
Allegan, Michigan 49010
- b. Applicant DUNS number: 051824944
- c. Funding Requested:
  - (i) Grant type: Assessment
  - (ii) Federal Funds Requested: \$200,000
  - (iii) Contamination: Hazardous Substances
  - (iv) Community-wide
- d. Location: City of Allegan, Allegan County, Michigan
- e. Property information for site specific proposal: NA
- f. Contacts:
  - (i) **Project Director:** Mr. Robert Hillard  
City of Allegan City Manager  
112 Locust Street, Allegan, Michigan  
Phone: (269) 217-7866, email: [rhillard@cityfofalllegan.org](mailto:rhillard@cityfofalllegan.org)
  - (ii) **Chief Executive:** Ms. Nancy Ingalsbee, Mayor  
City of Allegan  
112 Locust Street, Allegan, Michigan  
Phone: (269) 673-9995, email: [nancyj415@charter.net](mailto:nancyj415@charter.net)
- g. Date Submitted: December 14, 2015
- h. Project Period: Three years
- i. Population: 4,998 (*U.S. Census Bureau 2010*)
- j. Regional Priorities/Other Factors Checklist: Attached

Very truly yours,



Ms. Nancy Ingalsbee  
Mayor  
City of Allegan, Michigan

### Appendix 3

## Regional Priorities Form/Other Factors Checklist

Name of Applicant: City of Allegan, Michigan

### ***Regional Priorities Other Factor***

If your proposed Brownfields Assessment project will advance the regional priority(ies) identified in Section I.E, please indicate the regional priority(ies) and the page number(s) for where the information can be found within your 15-page narrative. Only address the priority(ies) for the region in which your project is located. EPA will verify these disclosures prior to selection and may consider this information during the selection process. If this information is not clearly discussed in your narrative proposal, it will not be considered during the selection process.

Regional Priority Title(s):

Coordinated Public Funding for Brownfields

Page Number(s): pg. 1, 5, 7-8, 11, 13

### ***Assessment Other Factors Checklist***

Please identify (with an **X**) which, if any of the below items apply to your community or your project as described in your proposal. To be considered for an Other Factor, you must include the page number where each applicable factor is discussed in your proposal. EPA will verify these disclosures prior to selection and may consider this information during the selection process. If this information is not clearly discussed in your narrative proposal or in any other attachments, it will not be considered during the selection process.

<b>Other Factor</b>	<b>Page #</b>
<i>None of the Other Factors are applicable.</i>	
Community population is 10,000 or less.	pg. 1, 4, 9
Applicant is, or will assist, a federally recognized Indian tribe or United States territory.	
Targeted brownfield sites are impacted by mine-scarred land.	
Project is primarily focusing on Phase II assessments.	pg. 7
Applicant demonstrates firm leveraging commitments for facilitating brownfield project completion by identifying amounts and contributors of funding in the proposal and have included documentation.	pg. 7-8
Recent (2008 or later) significant economic disruption has occurred within community, resulting in a significant percentage loss of community jobs and tax base.	pg. 4

<p>Applicant is one of the 24 recipients, or a core partner/implementation strategy party, of a “manufacturing community” designation provided by the Economic Development Administration (EDA) under the Investing in Manufacturing Communities Partnership (IMCP). To be considered, <b>applicants must clearly demonstrate in the proposal the nexus between their IMCP designation and the Brownfield activities. Additionally, applicants must attach documentation</b> which demonstrate either designation as one of the 24 recipients, or relevant pages from a recipient’s IMCP proposal which lists/describes the core partners and implementation strategy parties.</p>	
<p>Applicant is a recipient or a core partner of HUD-DOT-EPA Partnership for Sustainable Communities (PSC) grant funding or technical assistance that is directly tied to the proposed Brownfields project, and can demonstrate that funding from a PSC grant/technical assistance has or will benefit the project area. Examples of PSC grant or technical assistance include a HUD Regional Planning or Challenge grant, DOT Transportation Investment Generating Economic Recovery (TIGER), or EPA Smart Growth Implementation or Building Blocks Assistance, etc. To be considered, <b>applicant must attach documentation.</b></p>	
<p>Applicant is a recipient of an EPA Brownfields Area-Wide Planning grant.</p>	

**FY2016 UNITED STATES ENVIRONMENTAL PROTECTION AGENCY (U.S. EPA) BROWNFIELDS  
HAZARDOUS SUBSTANCES ASSESSMENT GRANT APPLICATION  
City of Allegan, Michigan**

**1. Community Need:**

**a. Targeted Community and Brownfields:**

**(i) Target Community Description:** The City of Allegan (City) is located in the southwestern portion of Lower Michigan, approximately 20 miles east of Lake Michigan. Allegan is a micro-community of approximately 5,000 that encompasses a 4.3 square-mile area bordered by rural townships. The Kalamazoo River, a Great Lakes Area of Concern (AOC) and a Superfund site, literally wraps around the City, creating an abundance of waterways and water features visible throughout the City (nearly 20% of the area of the City is water/wetlands). The river drew settlers and industry to the area in the early 1900s and the City was soon developed with mills and industrial operations. Neighborhoods evolved around these industrial facilities and the City prospered until the 1980s, when all manufacturing sectors began declining. Further downsizing in the manufacturing sector and the near failure of American automakers in 2008 and 2009 decimated the remaining industrial employers in the City, leaving the City with acres of brownfields, a vacant mill district along the river, and a downtown district struggling to reinvent itself. The City worked to acquire and coordinate public funding from state and federal agencies to begin the process of reviving their historic downtown district and deal with the industrial legacy that has left the Kalamazoo River designated as a Great Lakes AOC and Superfund site. The City even secured certification as a Redevelopment Ready Community by the State of Michigan and is poised to begin revitalizing the City. The main obstacle it is facing is addressing the brownfields that are impeding its redevelopment plans. The first step is evaluating the brownfields in two targeted areas: (1) the historic downtown district, and (2) the mill district – former industrial area adjacent to downtown that is surrounded on three sides by the Kalamazoo River. In order to take this step, the City needs assessment grant funds to fill its current funding gap and begin characterizing, cleaning up, and redeveloping these brownfields, which will directly advance the **U.S. EPA Region V regional priority** of coordinating public funds for brownfields projects.

**(ii) Demographic Information:**

Targeted Area	Population	Jobless Rate	Poverty Rate	Minority	Median Household Income	Per Capita Income	Food Stamp/ SNAP	< 5 Yrs Old
U.S.	311,536,594 <sup>1</sup>	6.1% <sup>2</sup>	15.4% <sup>1</sup>	26.0% <sup>1</sup>	\$53,046 <sup>1</sup>	\$28,155 <sup>1</sup>	12.4% <sup>1</sup>	6.4% <sup>1</sup>
Michigan	9,886,095 <sup>1</sup>	5.1% <sup>2</sup>	16.8% <sup>1</sup>	20.7% <sup>1</sup>	\$48,411 <sup>1</sup>	\$25,681 <sup>1</sup>	16.7% <sup>1</sup>	5.9% <sup>1</sup>
Allegan County	111,742 <sup>1</sup>	3.5% <sup>2</sup>	13.5% <sup>1</sup>	6.0% <sup>1</sup>	\$52,061 <sup>1</sup>	\$24,140 <sup>1</sup>	13.9% <sup>1</sup>	6.5% <sup>1</sup>
Allegan	5,008 <sup>1</sup>	9% <sup>3</sup>	16.5% <sup>1</sup>	4.2% <sup>1</sup>	\$42,318 <sup>1</sup>	\$20,203 <sup>1</sup>	23.2% <sup>1</sup>	9.0% <sup>1</sup>
Downtown and Mill Districts	2,212 <sup>4</sup>	NA	16.8% <sup>4</sup>	7.0% <sup>4</sup>	\$30,846-\$57,745 <sup>4</sup>	\$18,323-\$22,149 <sup>4</sup>	26.2% <sup>4</sup>	10.3% <sup>4</sup>

As shown above, the poverty and food stamp/assistance rates in the City are higher than the national average, and median and per capita incomes are lower than the state and national numbers. For parts of the downtown and mill districts, the income levels are nearly half the national levels and the assistance numbers are over twice the national rate. It is important to note that there is a higher percentage of young children in the City; however, there simply is not a significant percentage of non-white residents in the City.

**(iii) Description of Brownfields:** The City's main concern is the presence of brownfields concentrated in the downtown and mill districts along the Kalamazoo River. Because of its small size and the importance of the river to the City's image and ability to bring in visitors, these brownfields are impacting the entire community. The Michigan Department of Environmental Quality (MDEQ) identified over 15 sites with

<sup>1</sup> Data from 2009-2013 American Community Survey, S1701 Poverty Status in Past 12 Months, factfinder.census.gov.

<sup>2</sup> Data from Bureau of Labor Statistics (August 2015- not seasonally adj.), at www.bls.gov.

<sup>3</sup> The ALICE Project, Michigan, United Way, September 2014.

<sup>4</sup> Data from 2009-2013 American Community Survey, factfinder.census.gov

known environmental contamination within this small area (less 0.25 square miles), including the approximately 10-acre mill district (former lumber mills and associated industrial operations). There are also numerous smaller empty buildings that historically housed chemical-intensive dry cleaning, printing, and paint formulation operations. There are an additional 15 known sites of contamination throughout the City, including the 40-acre former Rockwell International automotive parts site that sits along the river just north of the downtown district. Due to the unsecured condition of the sites and the deteriorated buildings on them, it is possible for residents (especially children) to access the sites and the structures. Once on-site, they may be exposed to asbestos fibers (known to cause mesothelioma and asbestosis), lead-based paints/lead dust (known to cause neurological damage in children), and surficial soil contamination. Soil and groundwater at these sites is also often contaminated with fuels and solvents, posing vapor intrusion exposure concerns for nearby residents. Further increasing the negative affect of these brownfields is the fact that their real and perceived impact extends beyond their property boundaries. The migration of contaminated groundwater and run-off of impacted surficial soil spreads the brownfields contaminants onto adjoining sites and the Kalamazoo River, resulting in more potential exposures. The simple presence of blighted and unsightly buildings/grounds decreases the perceived value of adjoining sites, resulting in an ever-expanding area of undervalued and underused properties. Most of the brownfields in the City have not been fully characterized. The Rockwell site is known to be contaminated with polychlorinated biphenyls (PCBs), solvents, pesticides, cyanide, chromium, and other metals; however, the full extent of the exposure risks to residents and its potential impact on redevelopment options have not been determined. Major portions of the mill district and most of the smaller industrial/commercial brownfields located in the downtown district have not been characterized at all, or have only been initially assessed to determine that they are contaminated. Because of the City's small size, the entire population is at risk from these brownfields. Most schools, senior housing units, churches, parks, and low-income neighborhoods are within 500 to 1,000 feet of a brownfield. Due to the lack of information on the conditions of these sites, the perception of residents and business is that these brownfields and the neighborhoods that they are impacting cannot be safely or feasibly redeveloped, and they sit unused and falling further into decay. The following summary of sites located in the targeted areas illustrate typical past uses, contaminants, current conditions, and health threats posed by brownfields.

<u>Targeted Area</u>	<u>Environmental Contaminants</u>	<u>Current Conditions</u>
<b><u>DOWNTOWN DISTRICT</u></b> (vacant commercial, former auto service, dry cleaners, paint stores, printing shops, milling) (12 acres)	asbestos, heavy metals, volatile organic compounds (VOCs), chlorinated solvents, polynuclear aromatic hydrocarbons (PAHs)	23-83% vacant first floor commercial and mixed use upper floors (50,000 square feet of vacant upper floors)
<b>Health:</b> cancers, mesothelioma, respiratory problems, nerve/liver damage, impaired fetal development, birth defects (teratogens) <b>Sensitive receptors:</b> Impoverished neighborhoods, area students, churches, Allegan Cooperative Preschool, community parks, Kalamazoo River		
<b><u>MILL DISTRICT</u></b> (former lumber mills, wood processing, manufacturing) (10 acres surrounded by Kalamazoo River)	heavy metals, pesticides, cyanide, creosote, VOCs, PAHs, PCBs	vacant land, partially demolished buildings/slabs/foundations, dangerous buildings
<b>Health:</b> headaches, respiratory problems, asthma, nerve damage, liver/kidney damage, thyroid damage <b>Sensitive receptors:</b> Impoverished neighborhood, children, Kalamazoo River, community parks		

**(iv) Cumulative Environmental Issues:** The City's neighborhoods developed around Perrigo Company (pharmaceuticals), Rockwell International automotive parts manufacturing, Haworth office furniture/accessories manufacturing, lumber mills, and wood processing operations that centered on the Kalamazoo River. Three Michigan highways converge in downtown Allegan, the Allegan hydro power plant

is located in the nearby mill district, two sand and gravel pits and a local airport are located on the outskirts of the City, and 35 MDEQ-identified point source air emissions sources are located in the City and surrounding Allegan County. All of these sources have contributed to local air pollution and aesthetic (odor and visibility) concerns. The County was a non-attainment area for ozone air pollution from 1992-2000 and 2004-2009, proving that industrial and roadway emissions negatively impacted air quality for a long time. The County is identified in the Centers for Disease Control and Prevention's (CDC's) Environmental Public Health Tracking Network as having elevated levels of fine particulate matter (PM<sub>2.5</sub>), which is known to cause lung problems and lung cancer. In addition to decreasing air quality, the long history of manufacturing operations in the City and surrounding areas resulted in the designation of an 80-mile stretch of the Kalamazoo River as a Superfund site (including the portion of the river that runs through the City) due to the presence of PCBs. There are associated fish consumption advisories due to the presence of mercury, PCBs, and dioxins in fish tissue.

Now that many of the facilities are closed, emissions are lower but residents have already been exposed to airborne contaminants and are continuing to be exposed to residual contaminants at the abandoned sites and in the Kalamazoo River. In addition, the housing stock in the City is old (59% of the houses were constructed before 1978; 2009-2013 *American Community Survey*) meaning that most children in the City are continuing to be exposed to lead-based paint. As discussed in Section 1.b, health impacts from environmental pollutants are greater for the City's low income populations, who are more likely to live near current and former industrial operations. This illustrates the disproportionate cumulative impact of industrial operations and their subsequent brownfields on impoverished residents. This disproportionate impact represents an ongoing environmental justice concern for City residents. The U.S. EPA's Environmental Justice Screening and Mapping Tool (EJSCREEN) rates Allegan as worse than 79-98% of the country with respect to lead paint exposure, proximity to Superfund sites, and proximity to water dischargers!

**b. Impacts on Targeted Community:** Brownfields located in close proximity to residences, schools, parks, and churches are negatively impacting the entire City and especially sensitive populations (impoverished residents and children) by potentially exposing them to numerous contaminants via direct contact, ingestion, airborne particulate inhalation, and vapor intrusion pathways. These brownfields exposures, in addition to the cumulative environmental issues, have disproportionately impacted this small community. The sensitive populations in the City are even more susceptible to the effects of brownfields contaminants resulting in higher cancer death and adult asthma rates than Michigan and the nation (see table). City-specific data is not available. The Michigan Department of Community Health has found that

	U.S.	Michigan	Allegan County
Cancer Death Rate (per 100,000)	178.7 <sup>5</sup>	176.85 <sup>5</sup>	192.6 <sup>6</sup>
Adult Asthma Prevalence	8.8% <sup>7</sup>	9.3% <sup>8</sup>	11.5% <sup>9</sup>

children from impoverished areas are over four times more likely to be hospitalized for asthma than those from high-income areas (*Disparities in Michigan's Asthma Burden*, 2005). In Allegan, this translates into 18.4% of children with asthma enrolled in Medicaid visiting the emergency room at least once a year. In addition to asthma, 7.9-10% of adults in the County suffer from chronic obstructive pulmonary disease (COPD), which studies have found is linked to long term exposure to air pollution (CDC, *Behavioral Risk Factor Surveillance System*, 2011). This prevalence rate is higher than most of the similar rural counties in Michigan, and the health department indicates that air pollution impacts in the County are 14% greater than those in Michigan (*Allegan County's Community Health Needs Assessment Report*, December 2014).

Compounding the effect of brownfields and cumulative environmental pollutants is the fact that health concerns for sensitive populations are often intensified by lack of access to adequate health care and healthy lifestyle choices (food, exercise, etc.). Access to primary care physicians and fitness facilities is

<sup>5</sup> Michigan Cancer Surveillance Program, 2009-2013

<sup>6</sup> Michigan Department of Community Health, 2011-2013

<sup>7</sup> American Lung Association, *Trends in Asthma Morbidity and Mortality*, 2012

<sup>8</sup> Michigan Department of Community Health, *Epidemiology of Asthma in Michigan*, 2009

<sup>9</sup> Michigan Behavioral Risk Factor Survey, 2012-2014

limited in the County, with the rates ranging from 40% to 62% lower than those in Michigan (*Allegan County's Community Health Needs Assessment Report, December 2014*). It is likely that exposure to environmental pollutants has aggravated these public health concerns.

The second health/welfare concern is migration of brownfield pollution and illicit discharges to the Kalamazoo River, which wraps around the entire City, and migration to groundwater located in the City's Wellhead protection areas (which extend diagonally across the downtown and mill districts). The Kalamazoo River, a Great Lakes AOC and Superfund site, continues to be impacted by stormwater run-off from the over 30 known contaminated sites that are located within one mile of the river. The run-off presents a threat to the water quality (dissolved oxygen, toxicity, etc.) and sediments. The known PCB, mercury, and dioxin impacts prove that historical industrial operations have already contaminated this waterway. This contamination, which has impacted the aquatic life, may also expose residents, who use the waterways for fishing and recreation, to contaminated water and/or sediment. Since the City's drinking water production wells are also located in close proximity to these contaminated sites, it is imperative that the extent of groundwater contamination be determined and remediated to protect the City's drinking water.

### **c. Financial Need:**

**(i) Economic Conditions:** Much of the country has recovered from the Great Recession, but for Michigan and its manufacturing-based areas, the 2008-2009 recession was just the final blow after decades of downsizing and closing of industrial employers. The City's economy has always been heavily influenced by a few industrial/manufacturing employers. The downturn started in the 1990s when Rockwell International and the companies located in the mill district closed and eliminated hundreds of jobs. Smaller companies followed suit, cumulating with the closure of Haworth in 2008 (loss of 500 jobs) and downsizing of two other major companies since 2008 (loss of an additional 300 to 500 jobs). This has been devastating for a community of less than 5,000 people, which is now dependent on the Perrigo Company for employment opportunities. The population has remained relatively steady for the past 20 years, which means that residents are either taking lower-paying, retail-type jobs or they are traveling out of the City for work (61.8% of workers living in the City commute outside the City; *2009-2013 American Community Survey*), both of which have economic consequences. The switch to lower-paying jobs and the extra costs associated with commuting resulted in the poverty rate in the City nearly doubling since 2000 (*2000 Census and 2009-2013 American Community Survey*). The result of the long term economic decline and the 2008 crisis has been a wave of property abandonment and disinvestment across the City. Residents and businesses alike no longer have money to put back into their community and this contributes to the ongoing deterioration of the neighborhoods and commercial districts. The City coordinated public grant dollars to support Kalamazoo River improvements (fish passage, kayak access, bank stabilization) and downtown district building rehabilitation but these funds cannot be used to assess brownfields. The City needs Assessment Grants to fully realize its revitalization plans and supplement its current grants.

**(ii) Economic Impacts of Brownfields:** The City's efforts to address the effects of a steady decrease in employment opportunities, income levels, and tax revenues is being thwarted by the ever-increasing number of abandoned sites and brownfields accruing in the City. These brownfields create pockets of blight, directly contributing to the decline in property values (the median home value in the City is \$83,900, two times lower than the U.S. median value of \$181,400 (*2009-2013 American Community Survey*)), and reduction in tax base. This effect is magnified in a City this small where even one blighted site can have a large impact on a neighborhood or business district. The closure of industrial/commercial operations increased residential vacancy rates to 10.9% (*2009-2013 American Community Survey*), commercial vacancy rates in the downtown district to 28%-44%, and commercial vacancy rates in the mill district to 92% (reported by the City). As shown in the demographic table, the loss in employers resulted in lower incomes and higher poverty rates for City residents. It also hit children the hardest with the percentage of children under 18 living in poverty increased by nearly 250% between 2000 and 2012, and the rate of students eligible for free/reduced lunches increasing by nearly 100% in the same time period (*Allegan County's Community Health Needs Assessment Report, December 2014*). The combination of reduced property values and reduced incomes results in disinvestment by residents and businesses. This is an example of environmental injustice made worse because impoverished residents impacted by brownfields can't afford to move away from the brownfields. These economic woes have trickled upward to the City,



resulting in reduced revenue available to operate and provide redevelopment support. The City depends on property and income taxes, and the combination of declining property values and employment opportunities has severely impacted its budget. Property tax revenues decreased by 14.4% since 2008 and total revenues decreased by 10%. At the same time, general government and public safety expenses increased by over 10%. Operational budgets for vital municipal services (fire, police, waste management, etc.) must be preserved and the result is that the City has no “extra” money to support brownfields assessment and redevelopment. Compounding the problem, the City must secure unsafe buildings and maintain municipal services for areas where there are fewer residents and the tax base is not sufficient to support the area served. Until the brownfields present in the downtown and mill districts are redeveloped with viable businesses and housing and put back on the tax rolls, there will be no significant increase in the City’s tax base, and its fiscal conditions will not improve.

## **2. Project Description and Feasibility of Success:**

**a(i) Project Description:** The City has developed a mature redevelopment program and it plans to use the Assessment Grant to advance and improve the brownfields arm of this program. It will use the grant to assess, remediate, and redevelop City brownfields in order to improve the health and welfare of the community and limit contaminant runoff to the Kalamazoo River and migration to groundwater. These goals are directed by the objectives identified by Allegan’s citizens and leaders in the City’s Master and Downtown Strategic Plans: 1) strengthen and revitalize the downtown district, 2) increase access to the Kalamazoo River (especially in the mill district), 3) maintain and enhance the existing infrastructure while protecting water resources, 4) diversify the local economy to provide competitive wages and attract/maintain a highly-skilled workforce, 5) improve the City’s residential neighborhoods so that they support all segments of society and are safe and walkable, and 6) foster a sense of community and include/engage residents in City planning and projects. These objectives coincide with the **Livability Principles**<sup>10</sup>, which include: promoting equitable, affordable housing; enhancing economic competitiveness; supporting existing communities; and valuing communities and neighborhoods. To support these goals, the City will use the grant funds to assess sites in the two targeted areas and other high-risk and developable sites identified during the grant project as summarized in the following paragraphs. Redevelopment outcomes for the sites in the targeted areas are discussed in Section 4.

**Downtown District:** This area includes the downtown commercial and the riverfront areas, which are developed with multi-story historic buildings that were constructed in the 1880s and used for many purposes since that time. The City secured grant funds to complete a Target Market Analysis and develop a Placemaking Plan for the area. Based on the results of these analyses, it began construction of a riverfront amphitheater/green space and kayak launch. The City identified three prominent buildings that are ready for redevelopment. The City will use Assessment Grant funds to incentivize the assessment of these and other sites in the district to identify subsurface contamination and hazardous building materials to allow safe redevelopment and reuse of the buildings for mixed-use commercial and residential. Urban greenspace/gardens and pocket parks will be incorporated throughout the district to further connect the area to the Kalamazoo River.

**Mill District:** This area includes nearly 50,000 square feet of former industrial buildings and surrounding vacant land and wetlands. The City coordinated state, federal, and private funds to support river rehabilitation projects (Section 2.c), and it will use Assessment Grant funds to supplement this work by assessing brownfields to evaluate exposure pathways and develop mitigation/remediation strategies (both subsurface and hazardous materials) that are protective of human health and the environment. With this information, the mill district can be redeveloped with recreational facilities focused on the Kalamazoo River and associated small retail/commercial operations. This will help limit exposures to impacted river sediments and additional contamination associated with the long term industrial use of the area.

**Other Commercial/Industrial Sites** in the City will be assessed as business/developer interest or citizen concern occurs during the grant project. Assessment data will be used to support commercial/industrial

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<sup>10</sup> Principles adopted by the partnership between the U.S. EPA, U.S. Department of Transportation, and U.S. Department of Housing and Urban Development to promote smart growth.

and mixed-use redevelopments in areas with existing infrastructure. This will result in creation of local jobs, housing stock, and retail amenities.

In general, after a site is deemed eligible by the U.S. EPA, the community will be notified and the site will be assessed through performance of a Phase I Environmental Site Assessment (ESA) and/or a Phase II ESA. If a property transaction is imminent, a Phase I ESA will be completed to meet the future owner's due diligence requirements. Phase I ESAs will be conducted according to the requirements of All Appropriate Inquiry. If no transaction is pending, the assessment may proceed directly to a Phase II ESA. A Sampling and Analysis Plan and Health and Safety Plan will be submitted to the U.S. EPA for review prior to conducting Phase II activities. The typical assessment goals will be to determine the nature and extent of contamination; evaluate exposure pathways; conduct cleanup planning to determine mitigation/remediation strategies that are protective of human health and the environment; and support redevelopment.

**(ii) Project Timing:** The City and a qualified environmental consultant will lead a successful, community-oriented Assessment Grant project to support revitalization of brownfields. The City has extensive experience facilitating/managing grant projects, had an Assessment Pilot grant in 2000, and was the lead agency on a brownfields assessment grant coalition in 2008. The City will be responsible for the day-to-day grant operations (community outreach; coordinating access and assessment activities; and programmatic requirements). The City will also be responsible for procuring all contractual services (e.g., environmental consultants) and submittal of all required reports to the U.S. EPA.

The City will adhere to the following timeline to ensure Assessment Grant funds are expended by the end of the three-year grant period. The City will host a project "kick-off" meeting and prepare a Work Plan within one month of receiving notification of the Assessment Grant award. Concurrently, the City will retain a qualified environmental consultant in compliance with applicable federal procurement regulations. The consultant will assist with grant management operations, perform the assessment work, and assist with required reporting. Several brownfields in the targeted areas have already been identified and site access secured; therefore, assessments will begin once the selected environmental consultant receives U.S. EPA approval of their Quality Assurance Project Plan (QAPP) and community outreach has been initiated. The project team will meet monthly to ensure additional site access has been secured (see next subsection), individual projects are progressing, and the overall project schedule is being met.

**(iii) Site Selection:** The City selected the targeted areas because redevelopment of brownfields in these two districts will support the goals described in the Master and Downtown Strategic Plans, and because sites in these high-profile areas have the potential to serve as catalytic redevelopment projects which will lead to additional investment throughout the City. As the grant project progresses, other high-risk and developable sites identified by community members and community organizations will be integrated into the project. A prioritization system will be developed for selecting additional sites for assessment based on the following: 1) sites where available information indicates an imminent threat to public welfare or the environment exists, 2) high-opportunity brownfields that will help the City achieve its brownfields program goals, and 3) brownfields that are identified as high community priorities.

Site access will be obtained as follows: 1) for property transfers, a site access agreement will be included with the purchase agreement between the current and prospective owners, 2) for tax foreclosures, the City will work with Allegan County to obtain site access, 3) for lender foreclosures, the City will obtain an access agreement from the lender, and 4) for sites that present an imminent threat to public welfare or the environment, the City will use its public safety authority, or work with MDEQ or the Allegan County Health Department to obtain site access.

## **b. Task Description and Budget Table:**

**(i) Task Description:** The following tasks will be required to implement the project. Approximately 97% of the budget will go directly to community outreach, site assessment, and cleanup planning. No expenses will be incurred for fringe benefits or equipment. Costs for these categories will be in-kind.

**Task 1 - Programmatic Costs:** Programmatic costs of \$4,600 are included. The City is providing all personnel costs except for \$1,000 for updating and maintaining brownfields information (\$50/hour for 20 hours) and one person's attendance at two U.S. EPA Brownfields Conferences and one other brownfields

training program (\$1,200 per trip, \$3,600 total). Outputs include updated websites and brownfields files, continuing staff training, and improved brownfields knowledge.

**Task 2 Community Outreach:** Community outreach costs of \$5,000 are included. This includes contractual costs of \$4,000 for coordinating/conducting community involvement and outreach meetings, and City costs of \$1,000 (personnel and supplies) for preparing, printing, and mailing project information and marketing documents. Outputs include at least three public meetings and development of marketing documents that can be used to promote area brownfields.

**Task 3 Site Inventory and Selection:** The City has an initial inventory; inventory maintenance costs of \$3,000 are included. This includes travel costs of \$500 for identifying new sites and showing sites to interested parties. The environmental consultant will assist throughout the project at a cost of \$2,500. Outputs include updated brownfields inventory and brownfields marketing.

**Task 4 Site Assessment:** Sites will be evaluated through performance of Phase I and/or Phase II ESAs, conducted in accordance with All Appropriate Inquiry (ASTM Standard E1527-13) and other ASTM standards/practices. Based on past experience, the City anticipates Phase I ESA costs will range from \$2,500 to \$4,000 and Phase II ESA costs will range from \$20,000 to \$60,000. The budget includes contractual costs of \$174,000 based on conducting 8 Phase I ESAs at a cost of \$3,000 each (\$24,000 total), and 5 Phase II ESAs at a cost of \$30,000 each (\$150,000 total). These are averaged costs used for budgeting; actual costs may vary. Outputs include an anticipated 13 completed assessments.

**Task 5 Cleanup Planning:** The City will conduct cleanup/redevelopment planning as required by the MDEQ for brownfields where redevelopment is imminent. This may include preparation of Remedial Action Plans (RAPs), assessment of brownfield cleanup and redevelopment alternatives, and preparation of Brownfield Plans/Work Plans to support acquisition of tax increment financing (TIF). Contractual costs for this task are estimated at \$13,400, based on completing one RAP and three Brownfield Plans at a cost of \$3,350 each. Outputs include at least four cleanup planning documents.

In order to evaluate progress, the City will document the outputs listed above, and will measure the following outcomes: acres of land assessed, remediated, and redeveloped; acres of parks and greenspace preserved or created; number of jobs created or retained; tax revenue generated; redevelopment investment value; and other funding leveraged. The City will evaluate the project progress semi-annually and will adjust the site selection process if the project is not meeting the expected outcomes.

**(ii) Budget Table**

<b>Budget Categories</b>	<b>Hazardous Substances Grant Project Tasks</b>					
(programmatic costs only)	Task 1 Programmatic Costs	Task 2 Community Outreach	Task 3 Site Inventory	Task 4 Site Assessment	Task 5 Cleanup Planning	Total Budget
Personnel	\$1,000	\$500				<b>\$1,500</b>
Travel	\$3,600		\$500			<b>\$4,100</b>
Supplies		\$500				<b>\$500</b>
Contractual		\$4,000	\$2,500	\$174,000	\$13,400	<b>\$193,900</b>
Other						
<b>Total Budget</b>	<b>\$4,600</b>	<b>\$5,000</b>	<b>\$3,000</b>	<b>\$174,000</b>	<b>\$13,400</b>	<b>\$200,000</b>

**c. Ability to Leverage:** The City has a proven track record of coordinating federal and state grant funds with private investment and understands how to obtain and use other financial incentives to support brownfields redevelopment. The City is currently coordinating state and federal funding for projects along the Kalamazoo River (a Great Lakes Area of Concern) in the mill district. It is combining local funds and a grant from the Michigan Department of Natural Resources to develop an enhanced fish habitat and passage around an existing dam and create kayak access for recreational purposes. It is pursuing a Federal Emergency Management Agency (FEMA) grant for river bank stabilization in the same area. The Perrigo Company plans to contribute private funds to support the river bank stabilization project. Using these grant funds and private dollars, the City is beginning to address the environmental and access

concerns associated with the mill district; however, it has been unable to fund assessment (soil and groundwater and hazardous building materials sampling) of the large, former industrial facilities that remain in the district. The extent of subsurface contamination must be determined and asbestos-containing building materials and lead-based paint identified so these structures can be demolished and the area redeveloped into central recreational area focused on the Kalamazoo River. An Assessment Grant would bridge this funding gap and make the redevelopment of this key area of the City possible. Similarly, the City is coordinating state and federal funds from the U.S. Department of Agriculture (USDA) for riverfront improvements in the downtown district. Assessment Grant funds will complement this public funding by providing the assessment needed to safely redevelop the historical buildings in this district. In both districts, assessment grant funds will be used to directly support the **U.S. EPA Region V regional priority** of coordinating public funds for brownfields projects.

In addition, to the above-described leveraged funding that is underway, the City will use the leveraged funding/resources described below to support assessment grant management and community involvement and cover costs associated with remediation, demolition, site preparation, and redevelopment. Commitment letters for the non-City sources are included in Attachment 3.

<b>Source</b>	<b>Resources and Role</b>	<b>Estimated Value</b>
City of Allegan	Staff time to support programmatic, community outreach, site inventory, and financial tracking functions	<b>Up to \$10,000</b> (250 hrs @ \$40/hr)
	Staff and heavy equipment to support site access (site clearing, building access, light excavation, etc.).	<b>\$10,000</b> (equip/staff @ \$1,000/day, 10 days)
	Property tax abatements (50-100%) on new equipment and real property improvements up to 12 years	Depends on value of redevelopment
	City funds for redevelopment costs for riverfront improvement projects.	<b>\$500,000</b> budget for placemaking projects
	City Manager funds for professional services (attorney and consulting fees, etc.) for redevelopment	<b>\$20,000</b> per year available
Downtown Development Authority	Provide funds for historical facade preservation/rehabilitation, painting, and signage for downtown district buildings	Up to <b>\$50,000</b> per building (\$180,000 budgeted for downtown improvements)
Brownfield Redevelopment Authority/Economic Development Corporation	Include brownfields in the Allegan Brownfield Plan, which allows capture of incremental taxes to reimburse costs of eligible activities.	<b>\$100,000 to \$3,000,000</b>

The following existing state and federal resources are available by application and may be used to supplement grant funds:

- Michigan Brownfields Grants/Loans - Grants/loans up to \$1 million per site for assessment and remediation.
- Michigan Community Revitalization Program - Grants/loans up to \$10,000,000 to support brownfields redevelopment.
- U.S. EPA Brownfields Revolving Loan Fund (RLF) Grant Supplemental Funding and/or Cleanup Grants - RLF grant and/or Cleanup Grants of up to \$200,000 per site for grantee-owned property.
- Community Development Block Grant (CDBG) - Department of Housing and Urban Development (HUD) funds for construction of low to moderate income housing.
- Michigan Department of Transportation (MDOT) - Grants for infrastructure improvements.

### **3. Community Engagement and Partnerships**

#### **a. Plan for Involving Targeted Community and Other Stakeholders**

**(i) Community Involvement Plan:** Allegan is a micro-community of less than 5,000; therefore, the entire community will be impacted by the assessment and redevelopment of brownfields in the targeted downtown and mill districts. The City has long understood that all decisions it makes will be felt immediately by most residents and business and identified fostering a sense of community and identity as a key component of its Master Plan. The City will use the guidelines in its public participation policy to engage and receive input from the community throughout the grant project.

Due to its small size, Allegan does not have neighborhood association groups. Instead, when planning initiatives or projects, the City conducts stakeholder meetings and interviews and uses the results to guide the initiative or project. The City will use a similar approach for the assessment grant project. The main stakeholders in any grant project will be residents/property owners, community/citizens groups, business organizations in the area of the project, and the lenders and developers conducting or supporting the actual work. When a brownfields project begins, the City will reach out to the impacted residents/property owners, community organizations, and businesses and invite them to attend the initial stakeholders meeting to support project planning, site selection, cleanup decision making, and reuse planning, as appropriate. Depending on the scope of the project, the City may conduct verbal and written interviews of the stakeholders to collect additional data on how the community feels about the project and what ideas/concerns they might have on the assessment/cleanup/redevelopment. The City will also work with the community organizations listed in Section 3.c(ii) to acquire information on Kalamazoo River issues (Kalamazoo River Watershed Council), local business concerns (Chamber of Commerce), and impoverished residents' concerns (Bridge Street Church). These groups already came together to support development of the Master and Downtown Strategic Plans, and the City anticipates that it can easily bring them back together to involve them in brownfields assessment, cleanup, and redevelopment in the target areas. The City will provide written/electronic notices to lenders and developers who may be more removed from the day to day project activities than residents and business owners. Because the City completed numerous stakeholder involvement activities, it knows how to gauge the success of outreach. If the City recognizes the stakeholder meeting/interviews are not reaching the intended audiences (especially impoverished or underrepresented residents), it will make an effort to reach out to those people/businesses individually, going door to door if need be.

**(ii) Communicating Progress:** In addition to stakeholder meetings and stakeholder interviews, the City will also use the following methods to communicate project progress. Once awarded the grant, the City will announce the award to the community and solicit input to the Work Plan/Project Budget through a press release to local newspapers and by posting a notice on the City's "Positively Allegan" website and Facebook, which are interactive internet forums that update the community on what is going on in Allegan. The City will place advertisements on the local radio stations to reach members of the community at all educational levels and those without internet service. It will also send written/electronic notices to local businesses (bankers, real estate brokers, and developers). Stakeholders will be able to interact in real time with the City on their Positively Allegan Facebook page and a grant-specific LinkedIn group that will be established. The City will include instructions on how to reach these internet forums in the press release. Because the small Hispanic population (1.3%) reported that they speak English very well, translators/translators are not needed for community outreach (2009-2013, American Community Survey).

Hard copies of the draft Work Plan will be made available at the City Manager's office and the public library to ensure access for those without computers. The public will be able to provide comments verbally to Project Manager (Section 5a), electronically on Facebook/LinkedIn, and in writing via e-mail or letters. The comments will be discussed at a public meeting hosted by the City Manager. The draft Work Plan will be modified in response to relevant comments. Following Work Plan approval, the City will schedule a public kick-off meeting to acquaint the community with the project. The kick-off meeting will be broadcast via a webinar for citizens who cannot attend the meeting, and additional meetings will be scheduled, if needed. The City will ask the public to identify sites they consider to be brownfields and sites that they feel are impacting health and welfare. These sites will be added to the City's list of potential sites for funding. The meeting presentation materials and minutes will be posted on Facebook, LinkedIn, and the Positively

Allegan website. Sites will be selected for assessment based on community concern, developer interest, and the City's plan to evaluate sites in the targeted areas. As sites are selected, the City will present the reasoning for the selection on their internet forums and solicit public feedback as well as conduct stakeholder meetings/interviews (Section 3.a(i)). Project updates will be provided at the City's monthly Economic Development Corporation meeting. The Positively Allegan group will tweet and post project highlights and tidbits to increase community interest and engagement. City project team representatives will attend other city department and/or community organization meetings to discuss the project and/or specific site assessments. When cleanup and/or redevelopment planning is initiated, more intensive involvement activities, including explanations of plans and rationales and solicitation of comments and feedback on those plans, will be implemented and additional more in depth stakeholder meetings will be held. At the close of the project, the City will hold a final public meeting to notify the community of the outcomes of the project. The presentation materials and minutes will be archived and placed on the City's Positively Allegan website, Facebook page, and LinkedIn. By utilizing print, internet, radio, television, and monthly public meetings, the City believes it will be able to communicate effectively with the community.

**b. Partnerships with Government Agencies:**

**(i) Local/State/Tribal Environmental Authority:** The City will continue to engage local/state environmental/health agencies, using relationships developed during the long-term Kalamazoo River Superfund investigations and remedial actions to ensure that the project is successful and human health and the environment are protected. The partnership established with the Michigan Department of Environmental Quality (MDEQ) through the ongoing evaluations of the Kalamazoo River will be continued to ensure appropriate brownfields assessment and redevelopment. Assessments will be conducted in compliance with MDEQ's Michigan voluntary cleanup program (VCP), which operates as the local environmental oversight structure. The MDEQ will review and approve Closure Reports for sites where response actions are conducted. When tax increment financing or state grant/loan funds are used for environmental activities, response action Work Plans must be reviewed and approved by the MDEQ prior to implementation. Partnering with MDEQ staff will be important for acquisition of technical support, resolution of regulatory or procedural issues, and interpretation of rules/guidance documents. The cleanup criteria established by the MDEQ under the Michigan VCP will be used to identify and address on-site health and environmental threats posed by the identified contamination. If contamination discovered during assessment has the potential to negatively impact the health of local populations, especially as related to off-site exposures, the MDEQ will be brought in as a project partner.

The ACHD recently worked with local government agencies and community partners to develop a community health needs assessment to meet their goal of enhancing the community's total well-being. This timely assessment identified engaging the community as key to improving the overall health and well-being of the community. The ACHD has been actively involved in education/notification, testing and monitoring, and exposure evaluations in the County and is more interested than ever in working with community partners to address health concerns and the disparities facing the community. The ACHD works with the City to educate impoverished citizens on available health resources, provide basic health screening (blood pressure, cholesterol, etc.), and provide education/consultation for areas of groundwater contamination. The ACHD provides education and resources for women in low-income areas via the Maternal and Infant Health Program. The expertise and experience of ACHD will be called upon to help identify/verify off-site health threats posed by identified contamination; identify related toxicological issues and perform risk evaluations; conduct notification/education programs; and coordinate health testing if migration of contamination from a brownfields site is confirmed. A support letter from the ACHD is included in Attachment 2.

**(ii) Other Relevant Governmental Partnerships:** The City will continue its Kalamazoo River and past grants partnership with the U.S. EPA to secure site eligibility determinations and work through assessment grant questions. The City will develop a partnership with the U.S. EPA's Regional Sustainable Environmental Sciences program to help develop a sustainable approach to brownfields redevelopment. The City will partner with the Michigan State Housing Development Authority and HUD to secure technical and financial assistance to create and preserve safe low-moderate income housing in the targeted areas. The City will also continue to work with the Michigan Economic Development Corporation to secure state

tax increment reimbursement of eligible cleanup and redevelopment costs; and secure grants or loans to support cleanup activities on brownfields and other state redevelopment incentives.

### **c. Partnerships with Community Organizations**

**(i) Community-based Organizations and Role:** The following community-based organizations will be directly involved in the Assessment Grant project.

**Kalamazoo River Watershed Council (KRWC):** The KRWC is a County-wide partnership dedicated to improving and protecting the Kalamazoo River watershed. The KRWC will assist the City in public outreach to its members and other groups committed to environmental and resource stewardship. They will assist in identifying sites that have the potential to detrimentally impact the Kalamazoo River and its tributaries (especially in the mill district); educate the community regarding the importance of watershed management; and provide support for development plans that expand/create recreational areas, parks, trails, and wildlife areas along the Kalamazoo River.

**Michigan Works!:** Michigan Works! is a statewide workforce development system that assists employers in finding employees and works with the labor force to make sure they meet the needs of the employers. Michigan Works! will work with businesses interested in relocating to the City to develop training programs that will provide workers with the skills needed to work in these new businesses. They will also work to link residents to the training needed to secure employment in the environmental field.

**Bridge Street Church:** This church was established in 2008 to support the community of Allegan and provide a place for members to meet and share in faith. The church will work with the City to ensure that residents' concerns regarding health, safety, and community disruption associated with brownfields redevelopment activities are solicited and addressed during the assessment and redevelopment process. They will also work to keep the residents and businesses informed on the progress of redevelopment efforts in their neighborhoods.

**Allegan Area Educational Service Agency (AAESA):** The AAESA provides educational services that are too big or too expensive for local school districts to provide on their own (e.g., the Allegan County Technical and Education Center). AAESA programs support workforce development to provide an employment-ready pool of workers. They will encourage students and staff to volunteer to participate in on-the-ground community involvement activities (distributing information on sites selected for assessment and the associated redevelopment plans) and will work to keep students updated on the active assessment and redevelopment projects so they can pursue potential employment opportunities in the remediation field.

**Allegan Chamber of Commerce:** The Chamber works to represent and promote Allegan's businesses, and encourages business and industrial investment in the community. During the grant project, the Chamber will assist with downtown corridor revitalization planning and the marketing of brownfields in the downtown corridor.

**(ii) Letters of Commitment:** letters of support are in Attachment 4.

### **4. Project Benefits**

The City developed clear goals for the redevelopment of brownfields in the downtown and mill districts. These goals were directed by the objectives identified by Allegan's citizens and leaders in the City's Master and Downtown Strategic Plans. The City coordinated local, state, and federal funds to support redevelopment activities in these two districts and they now need Assessment Grant funds to begin characterizing, cleaning up, and redeveloping the brownfields that are inhibiting the revitalization of these key areas. With grant funds, the City will be able to incentivize redevelopment of brownfields and provide substantial health and welfare, environmental, and economic benefits to its residents.

#### **a. Health and/or Welfare and Environment:**

**(i) Health and/or Welfare Benefits:** Brownfields pose a threat to residents by allowing uncontrolled access to contaminated sites and buildings containing hazardous materials. This is especially problematic in the mill district where huge vacant buildings and acres of unsecured land can be accessed by anyone. Brownfields also pose a threat to residents and the environment via migration of contaminated groundwater and soil vapors and run-off of impacted surface soil. Due to the City's small size, brownfields pose a threat to the entire community. Threats to residents will be mitigated by completing site assessments designed to

identify the nature and extent of contamination, followed by development of cleanup plans that incorporate engineering and/or institutional controls to further limit exposures to guide remediation and redevelopment. Remediation and redevelopment of these brownfields will reduce potential exposures to contaminated soil and groundwater and limit migration of contaminated groundwater and soil gas onto nearby sites. This will further reduce potential hazardous substances exposures. The identification and removal of hazardous building materials (asbestos, lead, etc.), will eliminate potential airborne releases of contaminants during building rehabilitation activities and will make these buildings safer for residential and commercial uses. As the exposures to brownfield contaminants (heavy metals, VOCs, PAHs, PCBs, etc.) are reduced, this will reduce the community's cumulative environmental exposure risks and lead to lower cancer, asthma, and COPD rates, especially for the City's sensitive impoverished residents and children. In addition to improving the health of residents, the assessment and redevelopment of brownfields will remove the negative perception of the sites and surrounding areas. This will draw residents and businesses back into these areas, triggering additional reinvestment and redevelopment that will further improve the health and welfare of the community. This directly supports the **Livability Principle** of valuing communities and neighborhoods and the **equitable development** principle of investing in impoverished neighborhoods in a way that directly benefits the residents. Specific health and welfare benefits associated with assessment and redevelopment of brownfields in the two targeted districts are summarized in the table below. Similar benefits, in whole or part, can be expected from redevelopment of brownfields in other parts of the City.

Targeted Area	Assessment and Redevelopment Outcomes
<b>DOWNTOWN DISTRICT</b>	Asbestos and lead-based paint will be abated and structural improvements will be made to ensure buildings are safe to occupy. Paved areas will be rehabilitated to prevent direct contact exposures for impoverished residents and children. Active or passive vapor barrier or extraction systems will be installed in buildings where vapor intrusion is a health risk. The buildings will be renovated with lower floor commercial (grocery stores, restaurants, health clinics, etc.), upper floor residential lofts (including affordable units), and/or public amenities (theater, etc.). This will increase the 24-hour vitality of the district and increase the sense of community/identity. Urban greenspace/paths/pocket parks will be incorporated throughout the district to physically connect the mixed-use areas to the Kalamazoo River and soon-to-be-completed amphitheater and kayak launch. Paths/sidewalks will also connect the area to the mill district, providing residents and visitors walkable access to the district and the river.
<b>MILL DISTRICT</b>	The sites will be secured and the obsolete buildings will be demolished after asbestos and lead-based paints are abated. Soil and river bank contamination will be removed or capped, and VOC-impacted soil and groundwater will be remediated to limit vapor intrusion/inhalation health risks for residents and migration to Kalamazoo River and groundwater. The area will be developed with new recreational facilities that focus on the Kalamazoo River and tie into the new fish passage and kayak access points. This will provide residents with new recreational and fitness options. Small commercial/retail operations will be added near the district entry to provide entertainment/healthy food options for residents and visitors. The district will be connected to the downtown district via paths/sidewalks and to the main Perrigo manufacturing facility via an urban pedestrian/bike trail to allow employees easy access to the mill and downtown districts for lunch and breaks.

**(ii) Environmental Benefits:** The cleanup of brownfields along the Kalamazoo River, including on-site stormwater management, will limit uncontrolled, brownfield pollution sources and illicit discharges into the river watershed. This will reduce concentrations of known contaminants in the river (e.g., PCBs, mercury, and dioxins), improve aquatic life, and allow for fishing and recreational activities. The river can then become a safe, accessible, focal point of the community, which is a key component of the City's goals for the future. The reduction in groundwater contamination will also meet the goals established in the City's Wellhead protection plan and further improve the quality of life for the City's residents and visitors.



## **b. Environmental Benefits from Infrastructure Reuse/Sustainable Reuse**

**(i) Planning, Policies, and Other Tools:** Sustainable development principles, including focusing development on existing urban areas, matching land uses to available infrastructure, and protecting natural resources and greenspace, are woven into the City's Master Plan. In addition, to support the Redevelopment Ready Community certification, the City modified its zoning ordinance to include green stormwater management requirements. The City will use its site plan review process and zoning ordinance to ensure that brownfields redevelopments incorporate green stormwater management techniques (rain gardens, bioswales, etc.), deconstruction and source separation rather than traditional demolition of buildings, and use of low-volatility building materials (paints, adhesives, etc.). This will result in reduced treatment of stormwater, reduced waste generation, and healthier homes/buildings. The City will require grant funded projects to include greenspace elements in site plans (as possible), which supports local plans that require buffer strips and riparian zones to be preserved to control stormwater and preserve the natural integrity of the river. The City will also require grant-funded projects to meet the Wellhead Protection program requirements to ensure that land uses do not negatively impact the City's drinking water. To foster **sustainable redevelopment**, grant funds will only be provided for projects where necessary infrastructure exists or can be upgraded at a reasonable cost. This will allow the City to direct redevelopment into areas with existing infrastructure, limiting utility extensions, reducing construction materials (steel and concrete pipe, fiber optic lines, etc.), and reducing air emissions (greenhouse gases, particulate matter) from construction. These sustainable development approaches will help the City to reuse existing resources, reduce fossil fuel use and emissions, and minimize its energy use and waste generation during brownfields redevelopment. Furthermore, because most brownfields in the City are abandoned/underutilized manufacturing/commercial buildings located in the targeted areas, which are served by existing infrastructure, the reuse of these sites epitomizes **sustainable redevelopment**.

For the downtown district mixed-use redevelopments, the City will require the installation of energy efficient heating/cooling and lighting systems, resulting in a reduction in electricity and natural gas usage and reduced operating costs for owners/occupants. For the downtown buildings that will be redeveloped for public use, the City will encourage that the buildings be certified by the Leadership in Energy and Environmental Design (LEED) program. These types of requirements will also be applied to smaller redevelopments that arise during the grant project.

**(ii) Integrating Equitable Development or Livability Principles:** By redeveloping target area brownfields with accessible public amenities, urban greenspace, and affordable entertainment and housing options, the City hopes to create a more equitable community that provides residents access to affordable housing, creates healthy entertainment and fitness options, decreases blight, and reduces contamination in the Kalamazoo River. This approach epitomizes the equitable development principles of utilizing new investment in economically disadvantaged neighborhoods in a way that directly benefits the residents. Furthermore, because this work will be completed on existing industrial and commercial sites, residents will not be displaced from their homes or neighborhoods during cleanup and redevelopment. These redevelopment outcomes coincide with the guiding **Livability Principles of increasing economic competitiveness** (*redevelopment of downtown district with mixed-use residential and commercial/retail operations*), **leveraging federal investment** (*assessment grant, FEMA, and USDA dollars*), and **valuing/supporting the community and its neighborhoods** (*directing funds and redevelopment into the targeted districts that are central to the entire community*). These benefits coincide with the Master and Downtown Strategic Plan's goals of strengthening the downtown district, increasing access to the Kalamazoo River in the mill district, and improving the City's neighborhoods so they support all segments of the community. The City will continue to improve their housing ordinances so they improve the quality of dwellings (rental and owned) and neighborhoods and continue to use and update their public participation policy to ensure the minority populations are included in redevelopment planning/decisions.

## **c. Economic and Community Benefits**

Brownfields redevelopment will improve the City's economy, create jobs, increase the tax base, and provide affordable housing, all of which will help the City meet the Master and Downtown Strategic Plans' objectives of maintaining and enhancing existing infrastructure while diversifying the local economy to provide competitive wages and attract/maintain a highly-skilled workforce.

**(i) Economic or Non-economic Benefits:** One of the most important benefits of brownfields redevelopment will be reinvestment in the downtown and mill districts and their surrounding residential neighborhoods. The redevelopment of commercial buildings in the downtown district will create mixed-use units, creating additional affordable housing with easy, walkable access to commercial, retail, and entertainment/fitness amenities. The redevelopment of brownfields into low/moderate income housing in additional areas in the City will also reduce the disproportionate impact on home values in impoverished areas, help encourage improved homeowner equity, and increase the tax base. Increased housing, retail, recreational, educational, and employment options are expected to improve living conditions in the struggling target neighborhoods and attract additional service and retail development, further revitalizing these areas, reducing vacancy rates, and improving the tax base. This will improve the City's sense of community and identity, further encouraging residents to reinvest and support their community. The redevelopment of brownfields located in designated industrial areas of the City will stimulate the local economy by providing new industrial job opportunities for a work force that has been forced to find jobs outside the City. Perhaps most importantly, with these new commercial and industrial businesses, the City will have a more heterogeneous economic base, rendering it less vulnerable to disproportionate impact from one company or market sector. These outcomes coincide with the **Livability Principles of valuing and supporting the community and its neighborhoods and increasing economic competitiveness.**

The redevelopment of one of the downtown district's "redevelopment ready" buildings and six adjoining buildings that make up a prominent riverfront corner will result in investment of \$5 million (~ \$250,000 in annual tax revenue); creation of five first-floor retail spaces; fifteen, one to two bedroom upper floor residential units; support over 50 construction jobs; and create 10 to 20 permanent, full-time jobs. Similar investment dollars and economic outcomes could be expected from the redevelopment of additional blocks in this district. The revitalized downtown will support **equitable development** outcomes by creating a place for citizens to find affordable housing close to shopping, healthy food options, entertainment/fitness opportunities and provide visitors a place to mingle and shop and invest in the community. The City estimates that if just 1,500 people spent \$10 on lunch in downtown Allegan each week and \$10 on breakfast or dinner once every two weeks, over \$1 million would be pumped into the local economy.

The City identified preservation and incorporation of the Kalamazoo River as a focal point one of its key goals for the City's revitalization. Redevelopment of the downtown and mill districts with urban greenspace, paths, and recreational/fitness opportunities that lead to the river will give residents and visitors easy walkable access to the City's greatest natural resource. This will provide residents with more access to physical fitness opportunities (lacking in the City) and allow them to travel between key areas in the City without using a car. This supports **sustainable development** principles of community walkability and the **Livability Principle** of providing more transportation options.

**(ii) Job Creation Potential:** There are no U.S. EPA Environmental Workforce Development and Job Training programs currently operating in the City. The City will partner with AESA and the Michigan Works! workforce development program to link residents to the education and training necessary to learn the skills required for employment in the environmental field. Once trained, these residents can be hired by local remediation contractors who are completing the assessment, cleanup, and redevelopment activities on grant-funded sites. The City will update AESA and the Michigan Works! program on the active assessment grant projects so that they can provide their students with employment opportunities.

## **5. Programmatic Capability and Past Performance**

**a. Programmatic Capability:** The City has experience managing Assessment Grants and will use the same project team during the entire grant period. The project team includes the City Manager, City Finance Director, and an environmental consultant. The project team will be led by Project Manager Mr. Rob Hillard (Allegan City Manager), who has 25 years of planning, redevelopment, brownfield, and loan management experience. Mr. Hillard will be responsible for all grant operations (community outreach, marketing, initial project evaluations, site/loan document preparation, reporting, etc.), payment requests and transfers through the Automated Standard Application for Payments (ASAP) system, and management of the environmental consultant. Ms. Tracy Stull, Finance Director, will serve as assistant Project Manager. She will be involved in the daily grant operations and will become the Project Manager if Mr. Hillard leaves the City. Ms. Stull, who has over 10 years of experience in municipal accounting, will also be responsible

for establishing and managing the program's financial accounts. The City will retain an environmental consultant to assist in managing Assessment Grant activities and conduct environmental assessment tasks. The City will procure a highly qualified consultant for its current U.S. EPA grant through a competitive qualifications-based selection and interview process in accordance with applicable requirements of 40 CFR §31.36. The selected consultant(s) will have managed U.S. EPA Assessment Grant projects and be familiar with all programmatic requirements. The City understands that a strong relationship with the qualified environmental consultant(s) is necessary to the success of U.S. EPA grant projects. The consultant selected will be required to attend public meetings, provide updates on grant projects, and support the City.

The staff which will administer the assessment grant has a strong history of compliance with financial and reporting requirements for state and federal grants, including management of 2008 Coalition Assessment Grant (see Section 5.c). The City will diligently track, measure, and report on the success of the project utilizing Assessment, Cleanup, and Redevelopment Exchange System (ACRES) and will evaluate outcomes against those incorporated into the Work Plan and measure the success of redevelopment projects supported with assessment funding by the level of private investment, job creation, acres assessed, and the extent to which assessment, due care planning and future redevelopment results in the protection of human health and the environment. Refer to Section 2.b for specific outcomes and outputs which will be tracked and measured.

**b. Adverse Audits:** The City has not received adverse audit findings from an OMB Circular A-133 audit or an audit conducted by a federal, state, tribal, or local government inspector or similar organization.

**c. Past Performance and Accomplishments:**

(i) The City was awarded a U.S. EPA Assessment Pilot Grant for \$200,000, \$50,000 in greenspace supplemental funding in 2000, and was the lead agency of a Coalition that was awarded a \$200,000 U.S. EPA Assessment for Grant for hazardous substances in 2008 (BF00E60401). The pilot grant funds and the 2008 grant funds were both expended in less than three years (\$448.57 remained in 2008 grant).

1. Compliance with Grant Requirements: The City developed Work Plans and successfully negotiated Cooperative Agreements (CAs) with the U.S. EPA. The City complied with the Work Plans and their associated schedules, terms, and conditions. The City submitted and received approval for project Quality Assurance Project Plans (QAPPs) and associated updates, complied with quarterly reporting and annual financial status reporting requirements, and submitted to the U.S. EPA, via the ACRES database, the site information and assessment data for each grant. As discussed below, the City supported the assessment of over 18 sites (16 in the City), which resulted in the redevelopment of over 50 acres of brownfields. The Assessment Grants were successfully used to establish Allegan's brownfield program and support the redevelopment of the initial brownfields identified by the City. However, the assessments were not focused on sites in the downtown or along the Kalamazoo River as planned. Now that the City has created a functioning brownfield program, developed plans/strategies for redevelopment of the key downtown and mill district, and coordinated additional state and federal funding, it is ready to take a more systematic approach to assessing brownfields in these areas to support revitalization of these key districts. An Assessment Grant will fill the City's current funding gap to establish a comprehensive approach to brownfields assessment and redevelopment.

2. Accomplishments: Using the grants, the following outputs were achieved: 15 Phase I ESAs, 8 Phase II ESAs, and 3 supplemental assessments were completed; and 4 Baseline Environmental Assessment Reports and 2 Due Care Plans were prepared for the Michigan VCP. Using these grants, the City supported the following outcomes: assessment of 37 acres of brownfields, redevelopment of over 50 acres with nearly \$17 million in leveraged funding, creation of 161 jobs, preservation/creation of a city park and approximately 1,500 feet of linear river boardwalk and associated greenspace. The 2008 grant outputs and outcomes were reported in ACRES. Only portions of the 2000 grant outputs/outcomes were reported in ACRES because the City was learning the system. In addition to the city park and boardwalk, project outcomes in Allegan included the redevelopment of the former Haworth site into a County jail, expansion of Perrigo's pharmaceutical manufacturing facility, construction of airplane hangars at the local airport, and redevelopment of multiple sites in the Allegan industrial park.

## **ATTACHMENT 1**

Threshold Documentation

## THRESHOLD CRITERIA

### FY 2016 U.S. EPA BROWNFIELDS HAZARDOUS SUBSTANCES GRANT APPLICATION

Submitted By: City of Allegan, Allegan, Michigan

1. **Applicant Eligibility:** The City of Allegan is a General Purpose Unit of Local Government in the State of Michigan.
2. **Letter from the State or Tribal Environmental Authority:** A letter from the Michigan Department of Environmental Quality is included in Attachment 2.
3. **Community Involvement:** Allegan is a small town of less than 5,000; therefore, the entire community will be impacted by the assessment and redevelopment of brownfields. The City has long understood that all decisions it makes will be felt immediately by most residents and businesses, and has identified fostering a sense of community and identity as a key component of their Master Plan. They will use the guidelines in their public participation policy to engage and receive input from the community throughout the grant project.

Due to its small size, Allegan does not have neighborhood association groups. Instead, when planning initiatives or projects are begun, the City conducts stakeholder meetings and interviews and uses the results to guide the initiative or project. The City will use a similar approach for the assessment grant project. The main stakeholders in any grant project will be residents/property owners, community/citizens groups, business organizations in the area of the project, and the lenders and developers conducting or supporting the actual work. When a brownfields project is begun, the City will reach out to the impacted residents/property owners, community organizations, and businesses and invite them to attend the initial stakeholders meeting to support project planning, site selection, cleanup decision making, and reuse planning, as appropriate. Depending on the scope of the project, they may conduct verbal and written interviews of the stakeholders to collect additional data on how the community feels about the project and what ideas/concerns they might have on the assessment/cleanup/redevelopment. The City will also work with the key community organizations to acquire information on Kalamazoo River issues (Kalamazoo River Watershed Council), local business concerns (Chamber of Commerce), and impoverished residents' concerns (Bridge Street Church). These groups have already come together to support development of the Master and Downtown Strategic Plans, and the City anticipates that it can easily bring them back together to involve them in brownfields assessment, cleanup, and redevelopment in the target areas. The City will provide written/electronic notices to lenders and developers who may be more removed from the day to day project activities than residents and business owners. Because the City has completed numerous stakeholder involvement activities, they know how to gauge the success of their outreach. If they recognize that the stakeholder meeting/interviews are not reaching their intended audience (especially impoverished or underrepresented residents), they will make an effort to reach out to those people/business individually, going door to door if need be.

In addition to creating stakeholder meetings and conducting stakeholder interviews, the City will use the following methods to communicate progress of the grant project. Once awarded the grant, the City will announce the award to the community and solicit input to the Work Plan/Project Budget through a press release to local newspapers and by posting a notice on the City's "Positively Allegan" website and Facebook, which are interactive internet forums the update the community on what is going on in Allegan. The City will place advertisements on the local area radio stations to reach members of the community at all educational levels and those without internet service. They will also send written or electronic notices to local businesses (bankers, real estate brokers, and developers). Residents will be able to interact in real time with the City on their

Positively Allegan Facebook page and a grant-specific LinkedIn group that will be established. The City will include instructions on how to reach these internet forums in the press release. Because the small Hispanic population (1.3%) reported that they speak English very well, translators/Spanish translations are not needed for community outreach (2009-2013, American Community Survey).

Hard copies of the draft Work Plan will be made available at the City Manager's office and the public library to ensure access for those without computers. The public will be able to provide comments verbally to Project Manager (Section 5a), electronically on Facebook/LinkedIn, and in writing via e-mail or letters. The comments will be discussed at a public meeting hosted by the City Manager. The draft Work Plan will be modified in response to relevant comments. Following Work Plan approval, the City will schedule a public kick-off meeting to acquaint the community with the project. The kick-off meeting will be broadcast via a webinar for citizens who cannot attend the meeting, and additional meetings will be scheduled, if needed. The City will ask the public to identify sites they consider to be brownfields and sites that they feel are impacting health and welfare. These sites will be added to the City's list of potential sites for funding. The meeting presentation materials and minutes will be posted on Facebook, LinkedIn, and the Positively Allegan website. Sites will be selected for assessment based on community concern, developer interest, and the City's plan to evaluate sites in the targeted areas. As sites are selected, the City will present the reasoning for the selection on their internet forums and solicit public feedback as well as conduct stakeholder meetings/interviews. Project updates will be provided at the City's monthly Economic Development Corporation meeting. The Positively Allegan group will tweet project highlights and tidbits to increase community interest and engagement. City project team representatives will attend other city department and/or community organization meetings to discuss the project and/or specific site assessments. When cleanup and/or redevelopment planning is initiated, more intensive involvement activities, including explanations of plans and rationales and solicitation of comments and feedback on those plans, will be implemented and additional more in depth stakeholder meetings will be held. At the close of the project, the City will hold a final public meeting to notify the community of the outcomes of the project. The presentation materials and minutes will be archived and placed on the City's Positively Allegan website, Facebook page, and LinkedIn.

After an assessment is completed, the primary information flow will be outward to the community, notifying stakeholders about assessment activities, providing results of the assessments, and explaining health and environmental impacts. Assessment results will be available at City Hall and posted on the Positively Allegan website, Facebook, and LinkedIn. If health threats are identified, written notices will be sent to impacted citizens, and the area health departments will be contacted. When cleanup and/or redevelopment planning is initiated, more involvement activities, including explanations of plans and rationales and solicitation of comments and feedback on those plans, will be implemented. At the close of the project, the City will hold a final public meeting to notify the community of the outcomes of the project. The presentation materials and minutes will be archived and placed on the Positively Allegan website, Facebook, and LinkedIn. By utilizing print, internet, radio, television, monthly public meeting, the City believes it will be able to communicate effectively with the community.

4. **Site Eligibility and Property Ownership Eligibility:** This application is for a community-wide Brownfields Assessment Grant. Consequently, site eligibility and property ownership eligibility criteria are not applicable.

## **ATTACHMENT 2**

Letter from State Authority and Local Health Department



RICK SNYDER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
LANSING



DAN WYANT  
DIRECTOR

November 20, 2015

Mr. Rob Hillard, City Manager  
City of Allegan  
112 Locust Street  
Allegan, Michigan 49010

Dear Mr. Hillard:

SUBJECT: Michigan Department of Environmental Quality Acknowledgment of a United States Environmental Protection Agency Brownfield Grant Proposal for 2016

Thank you for your notice and request for a letter of acknowledgment for the city of Allegan's proposal to the United States Environmental Protection Agency (EPA) brownfield grant program. The Department of Environmental Quality, Remediation and Redevelopment Division encourages and supports locally-based assessment and redevelopment efforts. Our review of your proposed project meets the EPA's requirements under the proposal guidelines.

The city of Allegan is applying for a \$200,000 hazardous substances assessment grant which could be used to conduct assessment activities at eligible brownfield sites in the city. The city of Allegan is considered eligible for this grant as a general purpose unit of local government.

Should the EPA award this brownfield grant to the city, it would stimulate redevelopment and reuse of underutilized and contaminated properties and improve the economic development and environmental conditions in the municipality. If you need further information or assistance regarding specific brownfield sites, please contact me at the number below or by email at [smedleyr@michigan.gov](mailto:smedleyr@michigan.gov).

Sincerely,

Ronald L. Smedley  
Brownfield Redevelopment Coordinator  
Brownfield Redevelopment Unit  
Remediation and Redevelopment Division  
517-284-5153



# **ALLEGAN COUNTY HEALTH DEPARTMENT**

3255 – 122<sup>ND</sup> Ave., Suite 200, Allegan, MI 49010

## **Office Administration**

(269) 673-5411

## **Bioterrorism Preparedness**

(269) 686-4570

## **Personal Health**

(269) 673-5413

673-5415



## **Communicable Disease**

(269) 686-4524

## **Environmental Health**

(269) 673-5415

## **Resource Recovery**

(269)

December 3, 2015

Mr. Rob Hillard

City Manager

City of Allegan

112 Locust Street

Allegan, MI 49010

RE: FY 2016 U.S. EPA Brownfields Assessment Grant Application Community Support

Dear Mr. Hillard:

The Allegan County Health Department understands that the City of Allegan (City) is applying for a U.S. Environmental Protection Agency (EPA) Brownfields Assessment Grant. As part of the grant application, we understand that the City must secure support for the grant program. We believe that the grant project will benefit the community and support our mission to improve health and wellbeing of our community. We would like to offer our support for the project.

We have been actively involved in working with all sectors to improve the environmental and physical health in Allegan County. We work within Allegan City to provide services that foster a healthy environment. We know a healthy environment encourages not only economic vitality but also improved health outcomes of the community.

We will be a partner with the City and will partner with collaborative agencies to help identify/verify off-site health threats posed by identified brownfield contamination; identify related toxicological issues and perform risk evaluations; conduct notification/education programs; and coordination of health testing if migration of contamination from a brownfields site is confirmed.

We support the City as it seeks assessment grant funds and looks forward to working with the City as they begin cleaning up and redeveloping the brownfields that are impacting neighborhoods in the county.

Sincerely,

Angelique Joyner, MPH, RN

Health Officer

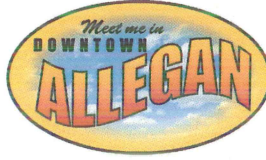
Allegan County Health Department

3255 122<sup>nd</sup> Ave Suite 200

Allegan, MI 49010

## **ATTACHMENT 3**

Leveraged Funding/Resources Documentation



November 16, 2015

Mr. Robert Hillard, City Manager  
City of Allegan  
112 Locust Street  
Allegan, MI 49010

RE: FY 2016 U.S. EPA Brownfields Assessment Grant Application Community Support

The Allegan Downtown Development Authority (DDA) understands that the City of Allegan is applying for a U.S. Environmental Protection Agency (EPA) Brownfields Assessment Grant. As part of the grant application, the DDA understands that the City must leverage additional funds/resources to support the grant project. The DDA believes that the grant project will benefit the entire City of Allegan and would like to offer its support for the project.

The DDA's mission is to correct and prevent deterioration in the downtown business district, to encourage historic preservation, and to promote the economic growth of the DDA District. The DDA understands that the City intends to use grant funds to support redevelopment of the downtown corridor, among other areas. The DDA will support grant-funded redevelopment activities in the downtown corridor by providing funds for historical façade preservation and rehabilitation for downtown corridor buildings. The DDA is committed to providing up to \$5,000 per grant-funded redevelopment that occurs in the downtown corridor.

The DDA fully supports the City as it seeks an Assessment Grant, and looks forward to using their programs and funds to support the redevelopment of brownfields in the City of Allegan.

Sincerely,

Frederick R. Jordan, Chair  
Downtown Development Authority

FJ:lv



November 16, 2015

Mr. Robert Hillard, City Manager  
City of Allegan  
112 Locust Street  
Allegan, MI 49010

RE: FY 2016 U.S. EPA Brownfields Assessment Grant Application Community Support

The Allegan Brownfield Redevelopment Authority (BRA) and Economic Development Corporation (EDC) understand that the City of Allegan (City) is applying for a U.S. Environmental Protection Agency (EPA) Brownfields Hazardous Materials Assessment Grant. As part of the grant application, we understand that the City must leverage additional funds/resources to support the grant project. We believe that the grant project will benefit the City of Allegan and would like to offer its support for the project.

The BRA and EDC are committed to helping the City leverage funds received from the requested EPA Assessment Grant. The BRA and EDC will work with the City to approve the inclusion of properties in the Allegan Brownfield Plan, which makes them eligible for tax increment financing of the excess costs of brownfield redevelopment. The following activities are eligible for tax increment financing: environmental assessment, cleanup planning, remediation and exposure mitigation, building demolition, asbestos abatement, site preparation, and infrastructure improvement. The BRA and EDC herewith commit to support inclusion in the Brownfield Plan of any eligible property on which EPA Assessment Grant funds are expended. This will allow capture of incremental taxes for up to 30 years to reimburse the costs of eligible activities. The value of this funding for any given project will depend on the value of the project, the amount of incremental taxes generated, and the amount of eligible costs. The value of this financial support for projects in Allegan could range from \$100,000 to \$3,000,000.

The BRA and EDC fully supports the City as it seeks an Assessment Grant, and looks forward to using their programs and funds to support the redevelopment of brownfields in the City of Allegan.

Sincerely,

Lovedia Stap, Chair  
Economic Development Corporation

LS:lv

## **ATTACHMENT 4**

Letters of Commitment from Community Organizations

November 23, 2015

Mr. Rob Hillard, City Manager  
City of Allegan  
112 Locust Street  
Allegan, MI 49010



RE: FY 2016 U.S. EPA Brownfields Assessment Grant Application Community Support

Dear Mr. Hillard:

The Kalamazoo River Watershed Council (KRWC) understands that the City of Allegan (City) is applying for a U.S. Environmental Protection Agency (EPA) Brownfields Assessment Grant. As part of the grant application, we understand that the City must secure community organization support for the grant program.

**Board of Directors**

Stephen Hamilton

Donald Brown

James Coury

Susan Founé

Robert Whitesides

Patricia Crowley

David Heinicke

Christine Kosmowski

Kenneth Kornheiser

Dennis Stelzer

Brian Huggett

The KRWC works with community, government agencies, and local businesses to improve and protect the health of the Kalamazoo River, its tributaries, and its watershed. The goals of the KRWC are to: 1) Promote wise stewardship and use of the natural resources of the Kalamazoo River and its watershed through education about its environmental, social, and economic issues; 2) Promote and celebrate the river as a recreational, aesthetic, and economic resource; 3) Facilitate, support, and provide technical assistance to partners addressing river and watershed issues, management planning, and funding; 4) Develop and implement resource protection and ecological enhancement projects; and, 5) Continue to function as the Public Advisory Council for all matters related to the problem of contaminated sediments in the Kalamazoo River system, advocating long-term solutions that will help produce a cleaner and safer river environment.

The Kalamazoo River was designated as an Area of Concern (AOC) under the 1987 [Great Lakes Water Quality Agreement](#). The river was listed as an AOC due to historic releases of PCBs associated with de-inking operations at local paper mills. The EPA has identified remediation of PCB-contaminated sediments in the river, control of nonpoint source pollution (particularly phosphorus), and habitat restoration as priorities for the Kalamazoo River. We believe that identifying, assessing, and redeveloping brownfields near the river is a key component to restoring this important local and regional ecosystem. This is especially important to the City of Allegan, which is literally intertwined with the Kalamazoo River.

The KRWC has produced an EPA-approved Watershed Management Plan as well as a Land Conservation Plan, the latter in collaboration with the Southwest Michigan Land Conservancy and the University of Michigan. We have therefore invested considerable energy in strategizing where we would best apply our resources towards protecting and improving water quality, habitat, and opportunities for public access and recreation throughout the watershed.

The KRWC's role in the grant project will be to assist the City in public outreach to our members and other groups committed to environmental and resource stewardship. We will assist the City in identifying sites that have the potential to detrimentally impact the Kalamazoo River and its tributaries; support the City with educating the community regarding the importance of watershed management; and provide support for development plans that expand/create recreational areas, parks, trails, and wildlife areas along the Kalamazoo River, especially in the former industrial Mill District in downtown Allegan.

The KRWC supports the City as it seeks assessment grant funds and looks forward to working with the City as they begin cleaning up and redeveloping the brownfields that are concentrated along the river corridor, where there is the most potential for improved public access and use of the river.

Sincerely,

A handwritten signature in black ink that reads "Stephen K. Hamilton".

Dr. Stephen K. Hamilton  
President

*The Kalamazoo River Watershed Council is a public, non-profit 501(c)3 organization whose purpose is to work collaboratively with the community, government agencies, local officials and businesses to improve and protect the health of the Kalamazoo River, its tributaries, and its watershed.*



**ADMINISTRATIVE OFFICE**

Area Community Services  
Employment & Training Council  
1550 Leonard NE  
Grand Rapids, MI 49505  
(616) 336-4100

**SERVICE CENTERS**

**Allegan County**

3255 122nd Ave  
Allegan, MI 49010  
(269) 686-5079

220 East Main St  
Fennville, MI 49408  
(269) 561-2001

**Barry County**

535 W Woodlawn Ave  
Hastings, MI 49058  
(269) 945-9545 ext. 144

**Kent County**

121 Franklin SE  
Grand Rapids, MI 40507  
(616) 336-4040

215 Straight Ave NW  
Grand Rapids, MI 49504  
(616) 336-4460

36 Applewood Dr  
Sparta, MI 49345  
(616) 887-2960

**Montcalm County**

114 S Greenville W Dr  
Greenville, MI 48838  
(616) 754-3611

**Muskegon County**

316 Morris Ave  
Muskegon, MI 49440  
(231) 724-6381

**Ottawa County**

121 Clover St  
Holland, MI 49423  
(616) 396-2154

November 24, 2015

Mr. Rob Hillard  
City Manager  
City of Allegan  
112 Locust Street  
Allegan, MI 49010

RE: FY 2016 U.S. EPA Brownfields Assessment Grant Application Community Support

Dear Mr. Hillard:

Michigan Works! is a statewide, unified workforce development system that has 16 agency locations across the State of Michigan. Michigan Works! assists area employers in finding and retaining qualified employees and works with the labor force to make sure they meet the needs of the employers.

We understand that the City of Allegan (City) is applying for a U.S. Environmental Protection Agency (EPA) Brownfields Assessment Grant. As part of the grant application, we understand that the City must secure community organization support for the grant program. We believe that the grant project will benefit the entire county and support our mission to promote workforce development. We would like to offer our support for the project.

As the leading workforce agency in the state, Michigan Works! will use its network of area businesses and available workers to link impoverished and disenfranchised residents with the education and training necessary to acquire employment with these existing businesses. We will also work with businesses interested in relocating to Allegan to develop training programs that will provide workers with the skills needed to work in these new businesses. Finally, we will work with the City, as possible, to link residents to the training needed to secure employment in the environmental field (i.e., environmental assessment, remediation, etc.).

Michigan Works! fully supports the City it seeks Assessment Grant funds, and looks forward to using our workforce development expertise to support the revitalization of Allegan.

Sincerely,

A handwritten signature in black ink, appearing to read "Jacob Maas", is written over a horizontal line.

**Jacob Maas**

*Chief Executive Officer*





December 1, 2015

Mr. Rob Hillard  
City Manager  
City of Allegan  
112 Locust Street  
Allegan, MI 49010

RE: FY 2016 U.S. EPA Brownfields Assessment Grant Application Community Support

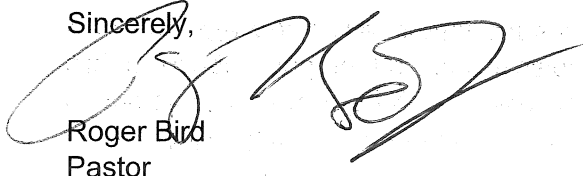
Dear Mr. Hillard:

The Bridge Church has heard that the City of Allegan (City) is applying for a U.S. Environmental Protection Agency (EPA) Brownfields Assessment Grant. As part of the grant application, we understand that the City must secure community organization support for the grant program. We believe that the grant project will benefit the entire City of Allegan and support our mission to improve the Allegan neighborhoods in which we work. We would like to offer our support for the project.

The Bridge started in 2008 to support the community of Allegan and to provide a place for the people of this community to grow their faith and put it into action. We believe the assessment grant project offers a perfect opportunity to support assessment and redevelopment of brownfields in the neighborhoods that have been disproportionately impacted by the presence of vacant and underused industrial and commercial facilities. We will disseminate information on the availability of assessment grant funds, information on sites selected for assessment, potential health concerns associated with the selected sites, and results of the assessment activities. We will work with the City and to ensure that residents' concerns regarding health, safety, and community disruption associated with brownfields redevelopment activities are solicited and addressed during the assessment and redevelopment process. We will also work to keep the residents and businesses informed on the progress of redevelopment efforts in their neighborhoods.

We love Allegan, and we support the City as it seeks assessment grant funds and look forward to working with the City as they begin cleaning up and redeveloping the brownfields that are impacting our impoverished neighborhoods.

Sincerely,



Roger Bird  
Pastor





Your partner in transforming  
lives through education,  
leadership and service

#### BOARD OF EDUCATION

Larry E. Collier, President  
Steve Tibbitts, Vice-President  
Sonja Skerbeck, Secretary  
William Parsons, Treasurer  
Bob Hennip, Trustee

#### SUPERINTENDENT

Mark R. Dobias

#### ADMINISTRATIVE OFFICES

310 Thomas Street  
Allegan, MI 49010  
269.673.2161  
Fax 269.673.2361  
TDD 1.800.649.3777

#### HILLSIDE LEARNING & BEHAVIOR CENTER

212 Grove Street  
Allegan, MI 49010  
269.673.2167  
Fax 269.673.8972

#### TECHNICAL & EDUCATION CENTER

2891 116<sup>th</sup> Avenue  
Allegan, MI 49010  
269.673.3121  
Fax 269.686.0327

[www.alleganaesa.org](http://www.alleganaesa.org)



ALLEGAN  
FENNVILLE  
GLENN  
HOPKINS  
MARTIN  
OTSEGO  
OUTLOOK  
PLAINWELL  
WAYLAND

November 17, 2015

Mr. Rob Hillard  
City Manager  
City of Allegan  
112 Locust Street  
Allegan, MI 49010

RE: FY 2016 U.S. EPA Brownfields Assessment Grant Application  
Community Support

Dear Mr. Hillard:

The Allegan Area Educational Service Agency (AAESA) understands that the City of Allegan (City) is applying for a U.S. Environmental Protection Agency (EPA) Brownfields Assessment Grant. As part of the grant application, we understand that the City must secure community organization support for the grant program. We believe that the grant project will benefit the entire City. We would like to offer our support for the project.

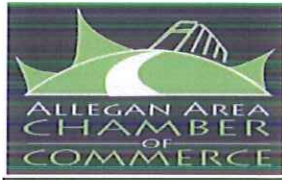
The AAESA provides services that are too big or too expensive for local school districts to provide on their own (e.g., the Allegan County Technical and Education Center, which provides 19 technical training and vocational programs). In addition to offering various technical and vocational programs, the AAESA serves as a resource for local businesses and industrial personnel who are updating their skills or who need retraining in technical fields. The AAESA also partners with Allegan County to provide central coordination for Economic Development Services and acts as a clearinghouse for information and assistance in retention, expansion, and attraction of businesses to the area. The AAESA programs support workforce development to provide an employment-ready pool of workers.

AAESA believes that the assessment grant project offers a perfect opportunity to both support the Allegan community and provide its students with real life experience in community service as well as in the field of environmental remediation and redevelopment. We will encourage students and staff to volunteer to participate in on-the-ground community involvement activities (distributing information on sites selected for assessment and the associated redevelopment plans). We will also work to keep students updated on the active assessment and redevelopment projects so they can pursue potential employment opportunities in the remediation field.

AAESA supports the City as it seeks assessment grant funds and looks forward to working with the City as they begin assessing and redeveloping the brownfields that are impacting our community.

Sincerely,

Mark R. Dobias, Superintendent



221 Trowbridge Street, Ste. B  
Allegan, MI 49010  
269.673.2479  
[director@alleganchamber.com](mailto:director@alleganchamber.com)  
[www.alleganchamber.com](http://www.alleganchamber.com)

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Thursday, December 10, 2015

Mr. Rob Hillard  
City Manager  
City of Allegan  
112 Locust Street  
Allegan, MI 49010

RE: FY 2016 U.S. EPA Brownfields Assessment Grant Application Community Support

Dear Mr. Hillard:

The Allegan Area Chamber of Commerce is pleased to support your application for a FY2016 U.S. EPA Brownfields Assessment Grant to assess and promote redevelopment of brownfield sites located in the City of Allegan.

As you know, the Allegan Area Chamber of Commerce is a community resource that assists and strengthens local businesses by providing advertising and networking opportunities, as well as hosting educational seminars. The Allegan Area Chamber of Commerce is eager to play a role in the Assessment Grant Project, and in coordination with the City, will host community economic development forums, advertise and disseminate information regarding the grant program via email blasts, the Chamber's website, and social media presence, and to help entrepreneurs understand, access, and utilize the grant funds. Many of our members have specific business expertise and knowledge which can assist the City in our community's redevelopment efforts.

The Allegan Area Chamber of Commerce is committed to improving regional economic conditions, and will provide its resources to support the City of Allegan's brownfield redevelopment efforts.

Sincerely,

A handwritten signature in black ink, appearing to read "Tim Perrigo", with a stylized flourish at the end.

Tim Perrigo  
Executive Director

## Application for Federal Assistance SF-424

\* 1. Type of Submission:

- ☐ Preapplication  
☒ Application  
☐ Changed/Corrected Application

\* 2. Type of Application:

- ☒ New  
☐ Continuation  
☐ Revision

\* If Revision, select appropriate letter(s):

\* Other (Specify):

\* 3. Date Received:

12/16/2015

4. Applicant Identifier:

5a. Federal Entity Identifier:

5b. Federal Award Identifier:

State Use Only:

6. Date Received by State:

7. State Application Identifier:

8. APPLICANT INFORMATION:

\* a. Legal Name:

City of Allegan

\* b. Employer/Taxpayer Identification Number (EIN/TIN):

38-6004518

\* c. Organizational DUNS:

0518249440000

d. Address:

\* Street1:

112 Locust Street

Street2:

\* City:

Allegan

County/Parish:

Allegan

\* State:

MI: Michigan

Province:

\* Country:

USA: UNITED STATES

\* Zip / Postal Code:

49010-1302

e. Organizational Unit:

Department Name:

City Manager

Division Name:

f. Name and contact information of person to be contacted on matters involving this application:

Prefix:

Mr.

\* First Name:

Robert

Middle Name:

\* Last Name:

Hillard

Suffix:

Title:

City Manager

Organizational Affiliation:

City of Allegan

\* Telephone Number:

269-217-7866

Fax Number:

269-686-5139

\* Email:

rhillard@cityofallegan.org

## Application for Federal Assistance SF-424

### \* 9. Type of Applicant 1: Select Applicant Type:

C: City or Township Government

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

\* Other (specify):

### \* 10. Name of Federal Agency:

Environmental Protection Agency

### 11. Catalog of Federal Domestic Assistance Number:

66.818

CFDA Title:

Brownfields Assessment and Cleanup Cooperative Agreements

### \* 12. Funding Opportunity Number:

EPA-OSWER-OBLR-15-04

\* Title:

FY16 Guidelines for Brownfields Assessment Grants

### 13. Competition Identification Number:

Title:

### 14. Areas Affected by Project (Cities, Counties, States, etc.):

Add Attachment

Delete Attachment

View Attachment

### \* 15. Descriptive Title of Applicant's Project:

FY2016 USEPA Brownfields Assessment Grant Application City of Allegan

Attach supporting documents as specified in agency instructions.

Add Attachments

Delete Attachments

View Attachments

**Application for Federal Assistance SF-424****16. Congressional Districts Of:**\* a. Applicant \* b. Program/Project 

Attach an additional list of Program/Project Congressional Districts if needed.

**17. Proposed Project:**\* a. Start Date: \* b. End Date: **18. Estimated Funding (\$):**

* a. Federal	<input type="text" value="200,000.00"/>
* b. Applicant	<input type="text" value="0.00"/>
* c. State	<input type="text" value="0.00"/>
* d. Local	<input type="text" value="0.00"/>
* e. Other	<input type="text" value="0.00"/>
* f. Program Income	<input type="text" value="0.00"/>
* g. TOTAL	<input type="text" value="200,000.00"/>

**\* 19. Is Application Subject to Review By State Under Executive Order 12372 Process?**

- ☒ a. This application was made available to the State under the Executive Order 12372 Process for review on .
- ☐ b. Program is subject to E.O. 12372 but has not been selected by the State for review.
- ☐ c. Program is not covered by E.O. 12372.

**\* 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)**☐ Yes ☒ No

If "Yes", provide explanation and attach

**21. \*By signing this application, I certify (1) to the statements contained in the list of certifications\*\* and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances\*\* and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 218, Section 1001)**

☒ \*\* I AGREE

\*\* The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.

**Authorized Representative:**

Prefix:  \* First Name:

Middle Name:

\* Last Name:

Suffix:

\* Title: \* Telephone Number:  Fax Number: \* Email: \* Signature of Authorized Representative:  \* Date Signed: